

Parcel ID: 24-035-040
UPI: 24-035-040-000-0000

<u>Name of Plaintiff</u>	<u>Name of Defendant</u>	<u>Kind of Suit</u>
Bala Jain, LLC 6007 Marilyn Drive Alexandria, Virginia 22310	EAGLE PROPERTIES AND INVESTMENTS LLC 445 Windover Avenue Vienna, Virginia 22180 Serve: J. Chapman Petersen, Esq. Chap Petersen & Associates, PLC 3970 Chain Bridge Road Fairfax, Virginia 22030 <i>Counsel for Eagle Properties and Investments, LLC, Monika Jain and Amit Jain</i>	The lawsuit alleges that one or more of the Defendants used money it borrowed from Bala Jain, LLC to acquire, improve, and/or develop the subject Property. The lawsuit alleges that the Defendants engaged

	MONIKA JAIN 445 Windover Avenue Vienna, VA 22180 Serve: J. Chapman Petersen, Esq. Chap Petersen & Associates, PLC 3970 Chain Bridge Road Fairfax, Virginia 22030 <i>Counsel for Eagle Properties and Investments, LLC, Monika Jain and Amit Jain</i>	in fraud, conspiracy to commit fraud, breach of contract, and seeks a declaratory judgment and injunctive relief establishing a constructive trust against this Property and such other relief as may be necessary to protect and prepare Bala Jain, LLC's interest in the Property.
	AMIT JAIN 445 Windover Avenue Vienna, VA 22180 Serve: J. Chapman Petersen, Esq. Chap Petersen & Associates, PLC 3970 Chain Bridge Road Fairfax, Virginia 22030 <i>Counsel for Eagle Properties and Investments, LLC, Monika Jain and Amit Jain</i>	
	FIRST CLASS TITLE, INC. 1803 Research Blvd, Suite 512 Rockville, Maryland 20850 Serve: Jessica Summers, Esq. The Law Firm of Paley Rothman 4800 Hampden Lane, 6 th Floor Bethesda, MD 20814 jsummers@paleyrothman.com <i>Counsel for First Class Title, Inc. and Daniel Kotz, Esq.</i>	
	Daniel Kotz, Esq. 1803 Research Blvd #512 Rockville, MD 20850 Serve: Jessica Summers, Esq. The Law Firm of Paley Rothman 4800 Hampden Lane, 6 th Floor Bethesda, MD 20814 jsummers@paleyrothman.com <i>Counsel for First Class Title, Inc. and Daniel Kotz, Esq.</i>	
	ARPAAGRO GENERAL TRADING, LLC 2567 Chain Bridge Rd Unit 2E Vienna, VA 22182	
	EAGLE PROPERTIES, LLC 445 Windover Ave. Vienna, VA 22180	
	EAGLE INVESTMENTS, LLC 445 Windover Ave. Vienna, VA 22180	
	TRUE PROPERTIES, LLC 2567 Chain Bridge Road, Unite 2E Vienna, Virginia 22182	

	TRUE PROPERTIES, LL 2567 Chain Bridge Road, Unite 2E Vienna, Virginia 22182,	
	Sell USA LLC 445 Windover Ave. Vienna, VA 22180	
	495 REAL ESTATE, LLC 2567 Chain Bridge Road, Unite 2E Vienna, Virginia 22182 2567 Chain Bridge Road, Unite 2E Vienna, Virginia 22182,	
	SHEHLA JARRAL 514 Bond Avenue Reisterstown, Maryland 21136	
	MUHAMMAD JARRAL 514 Bond Avenue Reisterstown, Maryland 21136	
	SPSVA, LLC c/O: Satpal Singh, registered agent 10313 Henderson Road Fairfax Station, Virginia 22039	
	DOLBI USA, LLC c/o: Shaikh R. Rahim, Managing Member 13306 Smoketown Road Woodbridge, Virginia 22192	
	SHAIKH M. RAHIM 145 W Ostend Street, Suite 600 Baltimore, Maryland 21230	
	MOHEED RAHIM 145 W Ostend Street, Suite 600 Baltimore, Maryland 21230	
	JACQUELINE ALEXANDER 1009 Sweetgrass Circle La Plata, Maryland 20646	
	CAPITAL ONE, NATIONAL ASSOCIATION 1680 Capital One Dr. Mc Lean, VA, 22102	
	FULTON FINANCIAL CORPORATION 1 Penn Sq, PO Box 4887 Lancaster, PA, 17602	
	MAIN STREET BANK c/o: Kagan, Stern, Marinello and Beard, PLLC, registered agent 10089 Fairfax Boulevard Fairfax, Virginia 22030	
	BANK OF CLARKE COUNTY c/o: Kathleen J. Chappell, registered agent 2 East Main Street Berryville, Virginia 22611	
	NAVY FEDERAL FINANCIAL GROUP, LLC 1007 Electric Ave, Vienna, VA, 22180	

	SAPTAL SINGH, 10313 Henderson Road Fairfax Station, Virginia 22039	
	ATLANTIC UNION BANK f./k/a UNION BANK & TRUST c/o: RACHAEL LAPE, registered agent Union Bankshares Corporation 1051 E. Cary Street, Suite 1200 Richmond, Virginia, 23219	
	PNC BANK, N.A. 249 Fifth Avenue Pittsburgh, Pennsylvania 15222	
	PRIMIS BANK D/B/A/ SONA BANK 10900 Nuckols Road, Suite 325 Glen Allen, Virginia 23060	

Please index this action filed in the Virginia state courts as a *lis pendens* against the property located at 580 West Areba Avenue, Hershey, Pennsylvania 17033. Parcel ID 24-035-040 UPI: 24-035-040-000-0000, more particularly described as:

ALL THAT CERTAIN tract of land situate in Derry Township, Dauphin County, Pennsylvania, designated and known as Lot No. 20 and the Easterly twenty-five (25) feet of Lot No. 19, Block No. 29, Subdivision D, bounded and described as follows:

BEGINNING at a point on the Southerly Street line of West Areba Avenue, said point being a distance of ninety-four and seventy hundredths (94.70) feet in a Northeasterly direction from the Southeasterly Street corner of West Areba Avenue and Mill Street; thence extending along the Southerly Street line of West Areba Avenue and along a curve to the right having a radius of three hundred fifty-five and fifty-four hundredths (355.54) feet, a chord of North sixty (60) degrees, twenty-nine (29) minutes East for a distance of seventy-four and eighty-five hundredths (74.85) feet to a point; thence extending along Lot No. 21, South twenty-three (23) degrees, fifty-seven (57) minutes East for a distance of one hundred forty-seven and thirty-nine hundredths (147.39) feet to a point on the Northerly side of a fifteen (15) feet wide public alley; thence extending along the Northerly side of said alley, South seventy-five (75) degrees, forty-five (45) minutes West for a distance of forty-eight and eight hundredths (48.08) feet to a point; thence extending along the remaining portion of Lot No. 19, North thirty-five (35) degrees, thirty-three (33) minutes West for a distance of one hundred thirty-four and seventy-nine hundredths (134.79) feet to a point on the Southerly Street line of West Areba Avenue, the place of BEGINNING.

PARCEL NO. 24-035-040-000-0000

I certify that this action involves title to real estate and seeks relief in the form of imposition of a constructive trust based on Eagle Properties and Investments, LLC's ("Eagle") use of loan proceeds it obtained from Bala Jain, LLC for the purchase, improvement and development of the real estate at issue. Bala Jain, LLC has filed a lawsuit against Eagle, Amit Jain, Monika Jain, First Class Title, and Daniel Kotz. The lawsuit alleges, *inter alia*, that: Amit Jain, Monika Jain, First Class title and Daniel Kotz committed fraud and conspiracy to commit fraud in order to deceive Bala Jain, LLC to lend Eagle \$7.5 million in loans to purchase, improve, and develop various real properties, including the real estate at issue (Counts I and II), and that Bala Jain is entitled to declaratory judgment that Eagle's failure to repay the loans combined with the other

defendants to fraud entitles Bala Jain to seek imposition of a constructive trust on the real estate at issue (Count III).

Plaintiff is seeking a Constructive Trust on the property referenced herein.

Dated: December 12, 2022

Respectfully submitted,



Alan V. Klein, Esq.
alan.klein@offitkurman.com
Attorney for Plaintiff
OFFIT KURMAN, P.A.
401 PLYMOUTH ROAD, SUITE 100
PLYMOUTH MEETING, PENNSYLVANIA
19462
(267) 338-1300

VERIFICATION

I, SHAIL BUTANI, verify that I am Managing Member of Bala Jain, LLC, a Virginia LLC, and I am authorized to make this verification on its behalf. The allegations in the foregoing praecipe to index an action as *lis pendens* are true and correct to the best of my knowledge, information, and belief. I understand that false statements herein are made subject to the penalties of 18 Pa. C.S.A. § 4904 relating to unsworn falsification to authorities.

Bala Jain, LLC, a Virginia LLC,

By: Shail Butani

SHAIL BUTANI

Its: Managing Member

Alan V. Klein, Esq.
alan.klein@offitkurman.com
Attorney I.D. No. 57104
OFFIT KURMAN, P.A.
401 PLYMOUTH ROAD, SUITE 100
PLYMOUTH MEETING, PENNSYLVANIA 19462
(267) 338-1300

IN THE COURT OF COMMON PLEAS OF
DAUPHIN COUNTY, PENNSYLVANIA
12th JUDICIAL DISTRICT

BALA JAIN, LLC,

Plaintiff[s],

v.

**EAGLE PROPERTIES AND
INVESTMENTS LLC, ET AL.,**

Defendant[s].

IN THE CIRCUIT COURT
OF FAIRFAX COUNTY VIRGINIA
No. [CL-2022-0009687]

**CERTIFICATION OF COMPLIANCE WITH
CASE RECORDS PUBLIC ACCESS POLICY**

I certify that this filing, which includes a Praeipie to Index as Lis Pendens, complies with the provisions of the *Case Records Public Access Policy of the Unified Judicial System of Pennsylvania* that require filing confidential information and documents differently than non-confidential information and documents.

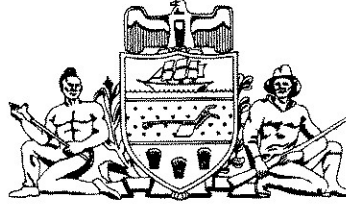
12/12/2022


Alan V. Klein

James M. Zugay, Esq.
Recorder of Deeds
(717) 780-6560
jzugay@dauphinc.org

Candace E. Meck
First Deputy
www.dauphinc.org/deeds

Dauphin County



Recorder of Deeds

Harrisburg, Pennsylvania

CERTIFIED END PAGE

Location:
Dauphin County Courthouse
Room 102
101 Market Street
Harrisburg, PA 17101

INSTRUMENT #: 20220035755
RECORD DATE: 12/13/2022 1:25:44 PM
RECORDED BY: CMECK
DOC TYPE: LIS PEND
AGENT: SIMPLIFILE
DIRECT NAME: BALA JAIN, LLC
INDIRECT NAME:

RECORDING FEES - State: \$0.50
RECORDING FEES - County: \$13.00
ACT 8 OF 1998: \$5.00
ADDITIONAL NAME FEE: \$6.00
TOTAL NAMES: \$10.50

UPICount: 1
UPIFee: 20
UPIList: 24-035-040-000-0000

I Certify This Document To Be Recorded
In Dauphin County, Pennsylvania.



James M. Zugay, Recorder of Deeds

THIS IS A CERTIFICATION PAGE

PLEASE DO NOT DETACH

THIS PAGE IS NOW PART OF THIS LEGAL DOCUMENT